

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

KRELLENSTEIN FAMILY LIMITED
PARTNERSHIP II OF 1999, a Delaware limited
partnership, KRELLENSTEIN FAMILY
ENTERPRISES, INC., a Delaware corporation, ELY
KRELLENSTEIN REVOCABLE TRUST OF 1994, a
Florida trust, ELY KRELLENSTEIN, as settlor, as
trustee, and as an individual, SHIRLEY
KRELLENSTEIN REVOCABLE TRUST OF 1994, a
Florida trust, and SHIRLEY KRELLENSTEIN, as
settlor, as trustee, and as an individual,

Defendants.

Adv. Pro. No. 10-04661 (SMB)

NOTICE OF EXTENDED RESPONSE DUE DATE

On November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 3141]. Pursuant to the Notice of Applicability filed by Plaintiff, Irving H. Picard (the “Trustee”), as trustee for the

liquidation of the business of Bernard L. Madoff Investment Services LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et. seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), in this Adversary Proceeding on December 1, 2010 [Dkt. No. 2], the Order and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter.

Pursuant to the Avoidance Procedures, § 2(E), the Trustee is required to file a “Notice of Extended Response Due Date” upon the termination of mediation setting forth the new response due date. In accordance therewith, the new response due date shall be thirty (30) days following the date of completion of the failed mediation.

The mediation of the Adversary Proceeding took place at the offices of Baker & Hostetler LLP in New York, New York on March 11, 2015. The mediation was unsuccessful and the deadline to conclude mediation passed on April 16, 2015. The Mediator’s Final Report was filed on April 17, 2015. In accordance with the Order, the Extended Response Due Date for Defendants to respond to the Complaint is June 4, 2015.

Dated: May 5, 2015
New York, New York

Of Counsel:

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Respectfully submitted,

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*